

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Robbins, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 637-2345; Fax: (702) 946-1345
9 lrobbins@wrightlegal.net

10 *Attorneys for Plaintiff, HSBC Bank USA, National Association, as Trustee for the*
11 *Certificateholders of ACE Securities Corp. Home Equity Loan Trust, Series 2007-WM1, Asset-*
12 *Backed Pass-Through Certificates*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 HSBC BANK USA, NATIONAL
16 ASSOCIATION, AS TRUSTEE FOR THE
17 CERTIFICATEHOLDERS OF ACE
18 SECURITIES CORP. HOME EQUITY LOAN
19 TRUST, SERIES 2007-WM1, ASSET-
20 BACKED PASS-THROUGH
21 CERTIFICATES,

22 Plaintiff,

23 vs.

24 FIDELITY NATIONAL TITLE GROUP,
25 INC.; FIDELITY NATIONAL TITLE
26 INSURANCE COMPANY; FIDELITY
27 NATIONAL TITLE AGENCY OF NEVADA,
28 INC.; DOE INDIVIDUALS I through X; and
ROE CORPORATIONS XI through XX,
inclusive,

Defendants.

Case No.: 2:20-cv-01515-JAD-BNW

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTIONS TO DISMISS [ECF Nos.
11-13]**

[Second Request]

ECF No. 23

Plaintiff, HSBC Bank USA, National Association, as Trustee for the Certificateholders of
ACE Securities Corp. Home Equity Loan Trust, Series 2007-WM1, Asset-Backed Pass-Through
Certificates (“HSBC Bank”), Defendants Fidelity National Title Insurance Company (“FNTIC”)
and Fidelity National Title Agency of Nevada, Inc. (“Fidelity Agency”), and Specially-

1 Appearing Defendant Fidelity National Title Group, Inc. (“FNTG”) (collectively, the “Parties”),
2 by and through their counsel of record, hereby stipulate and agree as follows:

- 3 1. On August 14, 2020, HSBC Bank filed its Complaint in Eighth Judicial District
4 Court, Case No. A-20-819620-C;
- 5 2. On August 17, 2020, FNTIC filed a Petition for Removal to this Court [ECF No. 1];
- 6 3. On September 15, 2020, FNTIC filed a Motion to Dismiss [ECF No. 11];
- 7 4. On September 15, 2020, Fidelity Agency filed a Motion to Dismiss [ECF No. 12];
- 8 5. On September 15, 2020, FNTG filed a Motion to Dismiss [ECF No. 13];
- 9 6. On September 26, 2020, this Court granted the Parties’ Stipulation and Order to
10 Extend Time Period to Respond to Motions to Dismiss [ECF Nos. 11-13] [First
11 Request [ECF No 18];
- 12 7. HSBC Bank’s deadline to respond to all pending Motions to Dismiss is currently
13 October 29, 2020;
- 14 8. HSBC Bank’s counsel is requesting an additional thirty-two (32) day extension until
15 Monday, November 30, 2020, to file its response to all pending Motions to Dismiss;
- 16 9. This extension is requested to allow counsel for HSBC Bank additional time to
17 prepare and finalize these responses due to Counsel’s overburdened schedule;
- 18 10. Counsel for FNTIC, Fidelity Agency and FNTG does not oppose the requested
19 extension;

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11. This is the first request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 26 th day of October, 2020.	DATED this 26 th of October, 2020.
WRIGHT, FINLAY & ZAK, LLP	SINCLAIR BRAUN LLP
<u>/s/ Lindsay D. Robbins</u> Lindsay D. Robbins, Esq. Nevada Bar No. 13474 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117 <i>Attorneys for Plaintiff, HSBC Bank USA, National Association, as Trustee for the Certificateholders of ACE Securities Corp. Home Equity Loan Trust, Series 2007-WM1, Asset-Backed Pass-Through Certificates</i>	<u>/s/ Kevin S. Sinclair</u> Kevin S. Sinclair, Esq. Nevada Bar No. 12277 16501 Ventura Boulevard, Suite 400 Encino, California 91436 <i>Attorney for Defendants, Fidelity National Title Group, Inc., Fidelity National Title Insurance Company, and Fidelity National Title Agency of Nevada, Inc.</i>

ORDER

Based on the parties' stipulation [ECF No. 23], IT IS SO ORDERED. The parties are cautioned, however, that counsel's workload and competing calendar demands will not be deemed good cause for additional extensions of this deadline.



U.S. District Judge Jennifer A. Dorsey
Dated: October 29, 2020